

BREINTON PARISH COUNCIL

Office 9, The Old Vicarage, 1 Rowberry Street, Bromyard, HR7 4DU.
clerk@breintonparishcouncil.gov.uk

Breinton Parish Council Response to Local Plan Consultation

Local Plan Strategic Policies

Policy CC1: A carbon neutral Herefordshire To achieve a carbon neutral Herefordshire, appropriate mitigation for the environmental and climatic impacts of development should be embedded within all development proposals from the outset. Developments should be located and designed in such a way that they are resilient to the impacts of climate change over their lifetime. Measures taken will vary depending on the location, such as whether in relation to an urban setting in Hereford or the market towns or in the county's rural areas. Development proposals will seek to contribute by:

Mitigating climate change

1. Demonstrating operational carbon neutrality on-site, through a fabric-first approach to its design, low carbon technologies, on-site renewable energy generation and carbon offsetting. Measures should be taken to minimise carbon emissions across the full lifecycle of the development before carbon offsetting is considered;
2. Maximising opportunities to secure significant reductions in carbon emissions for residential developments, by achieving energy efficiency standards in line with statutory and regulatory requirements. Major non-residential developments should demonstrate how they achieve Building Research Establishment Environmental Assessment Methodology (BREEAM) 'Excellent', or an equivalent or better methodology;
3. Maximising opportunities to generate energy from renewable sources on-site, such as from wind and solar. Neighbourhood Development Plans are strongly encouraged to support the provision of new community-owned energy schemes;
4. Maximising opportunities to source and/or generate energy from renewable sources off-site. Where evidence demonstrates that this is feasible, strategic sites should be connected to a District Heat Network. Where feasibility is not demonstrated, new homes should be built with the necessary infrastructure in place to enable such connections to be easily integrated in the future. In particular, opportunities should be sought to connect commercial development, producing sufficient levels of waste heat, with residential development where they are located within close proximity. District Heat Networks should be planned from the outset. Large-scale renewable energy schemes and diversification of renewable energy schemes with other uses will be supported where landscape and environmental impacts are considered acceptable;
5. Designing to provide an improved choice of transport modes. This can be facilitated by making it as safe and easy as possible to walk, wheel and cycle to essential facilities and services, and by locating within walking distance of public transport nodes. Active travel should be facilitated through design, such as the creation and enhancement of walking and cycling links in accordance with the principles of well-connected neighbourhoods. These should be integrated with new and existing green and blue corridors, wherever possible. **Extensive measures to encourage active travel and micromobility within Hereford will be supported alongside any new road or other transport**

infrastructure, to reduce traffic in the centre of the city. Similar measures will also be supported in the market towns;

These last 3 sentences are not compatible with tackling Climate Change. With transport in Herefordshire the largest emitter of Greenhouse gases, it is surprising there is not more mention of providing public transport, particularly rail in CC1 and not referencing the wording in the NPPF that developments should be located in order to minimise the need to travel, particularly by private car. AS this is a strategic policy for Herefordshire improving transport choice and taking measures to ENABLE active travel and micromobility should not be limited to the city.

Proposed revised wording for para 5.

5. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes (from Para 109 NPPF Dec 2023). Designing to provide an improved choice of transport modes. This can be facilitated by making it as safe and easy as possible to walk, wheel and cycle to essential facilities and services, and by locating within walking distance of public transport nodes. **Active travel should be facilitated through design, such as the creation and enhancement of walking and comprehensive, safe cycling networks**, in accordance with the principles of well-connected neighbourhoods. These should be integrated with new and existing green and blue corridors, wherever possible and linked with good public transport infrastructure. Extensive measures to encourage **ENABLE** active travel and micromobility within Hereford will be supported.

Policy AG1 Accommodating housing growth fails to mention that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development. (NPPF Dec 2023).

Policy PE1: Accommodating economic growth

This policy currently ignores the potential for employment at Moreton Business Park at Moreton-on-Lugg, which is well located to both the A49 and has a rail freight terminal. The complete estate covers 227 acres with 120 acres that have 315,000 square foot of outline planning permission available for new developments. ([About us | Moreton Business Park](#)).

At present there are nearly 700,000 square foot occupied by tenants and a train depot that moves around 250,000 tonne of aggregates a year, keeping lorries off the road.

This site repurposes land previously used by army ordinance, is one of the best located for sustainable employment and less than 3 miles from the new housing developments north of the city of Hereford and well connected by public buses. It is not clear why one of the largest employment sites in the County is omitted from the Local Plan study of employment sites 2022, and there is no mention in any of the Local Plan policies.

The land here is grade 3 & 4 which should be developed ahead of the best and most versatile land such as that at 3 Elms, which is Grade 1 & 2.

Likewise, there is no mention of the industrial employment sites and potential close to Pontrilas, again well located to the railway line and where Herefordshire Council have said opening a railway station at this location, along with another freight terminal, is a priority. This is predominantly Grade 3 agricultural land, well located for good transport links and where employment would expand opportunities for the South West of the County.

With 2/3rds of the population living outside of Hereford, for sustainable communities there should be employment sites allocated across the county that are well linked by public transport (bus services and rail) as well as good walking and cycling routes, to create good opportunities for all across the county, regardless of whether or not they can afford to own and run a car. The total requirement for new homes across rural areas is for 5,320 nearly as many as Hereford, and yet employment to support these is referred to as small scale employment.

Recommend that Policy PE1 is amended to reduce the level of employment land in Hereford and some of the market towns to allow for the Moreton-on-Lugg Business Park and Pontrilas sites and reduce the need for employment land on higher grade agricultural land preferring delivery of employment land on lower grade agricultural land. See proposed amendment in italics below. This would also ensure that this policy is consistent with the wording in Policy PE5.

Proposed amendment as follows: -

Policy PE1: Accommodating economic growth

Alongside housing growth and smaller scale employment sites, 182 hectares (ha) of new strategic employment land will need to be identified within the plan period. **Employment land will be identified and distributed to lower grade agricultural land, and favouring regeneration of brownfield sites, where they are well located to the good transport links (particularly rail and bus) and within 6km of residential developments, which can be connected by good, safe active travel links, reducing the need for travel by private car.**

LOCAL PLAN PLACE SHAPING POLICIES

In respect of Hereford it is unclear why the area of Burcott on the North East side of Hereford well located to the Roman Road and the Worcester Road outside of Flood Zone 3 and on some of the lowest grade agricultural land (Grade 4) compared to other sites in Policy HERE1 is not included for either housing or employment sites. The 3 Elms site is located on grade 2 agricultural land, classified as best and most versatile and recognised in the NPPF that it should only be developed after lower grade agricultural land/brownfield sites have previously been developed. In addition, this site poses a risk to the potable water supplies to 2 of the city's largest employers, and the potential loss of over 3,000 jobs. There seems scant evidence of the need for the level of new housing within Hereford, and any development should be located close to existing employment sites such as Rotherwas.

The land in and around Three Elms and south of the Kings Acre Road lies over an underground river and ground water source, with water levels and springs right up to the Green Lane bridleway on the ridge bordering Breinton Parish Council. Even in the dry weather of 2023 the springs along the ridge line did not dry up due to these underground water resources. The lack of knowledge of this large underground water reservoir needs to be properly understood to prevent new developments

generating increased flood risk both within the area and downstream in the City of Hereford, and also to prevent pollution of potable water supplies, used by local industry. This lack of knowledge of the hydrology in this area has resulted in the Environment Agencies flood alleviation scheme around the Fayre Oaks mobile home park going into an aquifer and increasing the flood risk to other existing properties South of Kings Acre Road.

Proposed amendment to Policy HERE1:-

Policy HERE1: Strategic development for Hereford

Hereford will accommodate a minimum of **4,500** new homes during the plan period.

The following locations have been identified for strategic residential development:

- HERE2 Hereford city centre - approximately 800 new homes.
- HERE5 Land at Holmer North - approximately 900 new homes;
- ~~HERE6 Land at Three Elms - approximately 950 new homes;~~
- HERE7 Land at Lower Bullingham - approximately 1,000 new homes;

Development to the west of Hereford city centre will be considered once a full hydrological survey has been undertaken of the area, to avoid increased risk of flooding to existing and new developments, including Hereford City and to avoid polluting the potable water supplies to existing employment sites.

The remaining new homes will be delivered through non-strategic sites allocated in either a Neighbourhood Development Plan or further Development Plan Document, existing commitments and windfall developments

To complement the housing growth, around 40 to 60 hectares of new employment land is expected to be delivered within this plan period, to support future employment needs. Approximately 22 hectares has been identified in Policy HERE3; Hereford Enterprise Zone Extension **and land east of the Hereford Cattle Market**. Further employment land will be expected to come forward through mixed use schemes on the strategic allocations; HERE5, ~~HERE6~~ and HERE7.

The area in which this future growth may take place is defined by the Hereford settlement boundary, as shown on the key diagram. Development in areas outside this boundary will be subject to the Rural Policies RURA1 to RURA5.

In addition to the requirements of other Local Plan policies, new development proposals in Hereford will be supported where they:

1. Strengthen and safeguard the vitality and viability of Hereford city centre. Hereford city centre will continue to be supported to serve its sub-regional status as a shopping destination. The retail boundary, as identified within this policy, outlines the boundary of the town centre. Future retail proposals outside the town centre boundary will be subject to a retail impact assessment (Policy PE3) to identify any potential adverse effects on the town centre's retailers and traders;
2. Secure and/or assist in delivering, where necessary, a new or expanded GP surgery, to alleviate both current pressure and support an increase in local population;
3. Where necessary, safeguard land for new schools and either deliver schools or make additional contributions towards education facilities;
4. Demonstrate that proposals reflect and are sympathetic to the special character and distinctiveness of Hereford's historic city centre, Conservation Areas, Area of Archaeological Importance and wider urban area. Development proposals must also demonstrate that they align with the Hereford Design Code;

5. Ensure that development does not exacerbate air quality conditions within the designated Air Quality Management Area, centred on the A465 and north of the city centre; **and that new housing developments are not located alongside trunk or major road schemes without sufficient green boundaries to insulate existing and future residents from noise and air pollution.**

6. Minimise impacts upon the local transport network in and around Hereford through careful location and design. Furthermore, they should offer access to a choice of transport modes, in accordance with Policy CC1; and

7. Safeguard, enhance and extend access to green and blue networks and spaces along the Great Western Way, the Herefordshire and Gloucestershire Canal route, River Wye, Yazor Brook and Public Rights of Way to Belmont Country Park and the surrounding countryside. Make provision in appropriate locations for urban greening and tree planting within and surrounding Hereford city.

Allocating the employment site at 3 Elms on Grade 1 and Grade 2 land is not in conformity with NPPF guidance for developing brownfield and lower grade agricultural land ahead of the best and most versatile agricultural land. Such high-grade land is vital in ensuring food security and its ability to absorb carbon emissions and reduce flood risk, more efficiently than poorer grades of soils. In addition, this site poses a risk to polluting potable water supplies to 2 of the largest employers in Hereford whose water supplies are downstream of this site and so development in this area would not be in conformity of the Policy HERE3 ambition to support existing jobs in Hereford. With the urban development at Holmer approx 3 miles from Moreton-on-Lugg one of the largest employment sites in the County, on the main Cardiff to Manchester railway line, with a freight rail head and located on the A49 on Grade 4 agricultural land this should be considered as an employment site ahead of 3 Elms.

Amended wording proposed to:-

Policy HERE3: Supporting jobs in Hereford

Hereford's role as the main economic centre for the county will be strengthened by supporting proposals that contribute to an increase and diversification of the city's employment land supply, allowing new and existing businesses to grow and thrive. **Employment provision will be delivered on lower grade land through:**

- Supporting a 7 hectare extension of the existing Hereford Enterprise Zone (HEZ) at Rotherwas;
 - **Supporting a new 15 hectare employment site adjacent to the Three Elms urban expansion at Hereford Cattle Market;**
 - The planned urban extensions at Holmer and Lower Bullingham providing an element of employment provision;
 - Encouraging economic development in association with local educational institutions, and the cyber security sector;
 - Encouragement of small scale environmental and knowledge based employment opportunities;
- and
- Redevelopment of brownfield opportunities.

Existing strategic employment sites will be safeguarded, these include:

- Hereford Enterprise Zone
- Westfields Trading Estate
- Three Elms Trading Estate
- Holmer Road

Policy HERE4: Supporting movement in and around Hereford

The element in policy HERE4 for building strategic road infrastructure is not compatible with the strategic Policy CC1: A carbon neutral Herefordshire, especially when transport is responsible for the largest emissions of any sector. This policy also ignores the potential to reduce the high levels of peak time congestion arising from the school/college run particularly in the Northeast quadrant of the city, which suffers the highest levels of term time congestion.

Policy HERE4 also does not build on the ambition to make Hereford a central hub for the County providing a wide range of services, employment, retail and education if it is not accessible by sustainable means for people living in towns and villages outside of the City.

It is proposed that the wording of the policy is amended as follows: -

Policy HERE4: Supporting movement **into and around Hereford**

Over the plan period, a package of measures will be introduced to provide more options for moving **into**, through and around the city.

These will include:

- A multi-modal transport interchange centred on the railway station **linked to investment in new stations at Pontrilas and Moreton-on-Lugg; (conformity with policy RURA 4 Rural Strategic Transport).**
- Multi-storey parking provision on the site of the current country bus station;
- Improvements to public realm and green infrastructure corridors that act as **safe, segregated** pedestrian and cycle routes, **particularly ensuring that all schools and colleges have up to date travel plans that are supported with safe routes for students of all ages to move independently to and from education by a means other than by private car ;** and
- ~~Infrastructure capacity to be delivered, including a western corridor for establishing strategic road infrastructure, to support the planned growth of the city.~~

New development in Hereford must ensure accessibility to the city centre, public transport services and other key destinations, through a choice of travel options, including provision **of a comprehensive network of safe,** active travel links. This will encourage walking and cycling for shorter journeys, helping to ease traffic congestion within the city and promote healthier living.

Policy HERE6: Sustainable urban expansion at Three Elms

The development of this site on the highest grades of agricultural land is contrary to NPPF about developing brownfield and lower grade soils, which are important in the ambition to achieve net zero by 2030. In addition, development of this site, over an underground river network, poses a significant risk to over 3,000 jobs at 2 of the city's largest employers, Avara and Heineken that rely on the potable water sources that are held in the aquifers under this site close to the ground surface. This would therefore not be compatible with Policy HERE3 Supporting jobs in Hereford, as there could be a net loss of jobs within the city.

As the site is located less than 10 mins by bike on a flat road into Hereford City, development in this area would not require strategic road infrastructure just safe, alternatives to give people the choice of travelling by safe means other than by car. For over 20 years Breinton PC has been requesting

safe, cycling provision alongside Kings Acre Road, to enable families to safely cycle into and around Hereford.

In addition, Breinton Parish Council would suggest that any future development or planning applications south of Kings Acre Road should include a full hydrological survey due to underground aquifers across this whole area that pose a risk to both businesses and residential properties, existing and future.

If Herefordshire Council are determined to include development West of Hereford City Centre in this location, Breinton Parish Council recommends amending the policy wording as follows: -

Policy HERE6: Sustainable urban expansion at Three Elms

Land identified at Three Elms between the Roman Road (A4103) and the Canon Pyon Road (A4110) will deliver a master planned mixed use urban extension which will be required to be in alignment with the strategic policies, and:

Housing requirement:

1. Accommodate ~~around 950~~ new homes, at an average density of up to 35 dwellings per hectare, comprising a mix of market and affordable house sizes and types in accordance with Policy BC1 and reflect the needs identified in the latest version of the Herefordshire Housing Market Area Needs Assessment, likely to come forward in phases over the plan period ~~as highway capacity allows~~;
2. Include 35% affordable housing;
3. A minimum of 5% of the dwellings being made available as dedicated services plots for self or custom build housing in accordance with Policy BC3;

Access:

4. Include a park and choose transport interchange **supported with frequent, low cost public transport services**;
5. ~~Contribute towards new and improved strategic road infrastructure,~~
6. Make use of opportunities for walking, cycling and wheeling afforded by existing onsite rights of way. **In particular to protect the route of the old railway line route through the site that runs from the city out to Moorhampton, as a safe, off-road walking, cycling route for both recreational and commuting by means other than car for communities that live along this route.**
7. Retain a green corridor around the Yazor Brook which runs through the site for the purposes of nature conservation, recreation and walking, cycling and wheeling connections to the city centre;

Employment:

8. ~~Include around 8 hectares of employment land in the west of the scheme, to be accessed from the A438 via the adjacent Hereford Cattle Market employment site;~~

Community:

9. Provide a local centre with small scale shops and amenities;
 10. Safeguard land for the expansion of Whitecross Hereford High School;
- Contribute proportionally towards the co- delivery of a new primary school to serve both this urban expansion and that set out in HERE5 and to contribute to other education provision as required;
12. Where a need is identified, provide contributions to new (or extensions to) community or recreational facilities;
 13. Contribute towards new or expansions to existing local medical facilities;
 14. Carry out a Health Impact Assessment, to ensure that the health and wellbeing of future residents is maximised;

Design and open space:

15. Provide new high quality green and blue infrastructure within the development benefitting both residents and wildlife, making use of the Yazor Brook corridor and ensuring connectivity to beyond the site's boundaries;

16. Proposals for biodiversity net gain (BNG) must be provided as part of the development. The layout and siting of the scheme should avoid any negative impact on biodiversity. Residential development must deliver 20% BNG, as measured by the statutory biodiversity metric, and which should preferably be located within or adjacent to the development site. Commercial development must deliver at least 10% BNG. If demonstrably not practical to deliver the required level of BNG on-site, details of a suitable and appropriate off-site solution for the remaining net gain should be provided, or, as a last resort, statutory biodiversity credits should be purchased. For significant on-site gains, and all off-site gains, BNG must be maintained for at least 30 years after completion;

17. Provide a landscape buffer, between Huntington village and the site;

18. Limiting structure height to two storeys where development sits closest to listed buildings;
Heritage assets:

19. Evaluate the archaeological importance of the area in order to ensure appropriate protection of heritage assets and inform the detailed development proposals;

20. Be designed to avoid any adverse effects upon the setting of Huntington Conservation Area and its Grade II listed church; and

21. Avoid development in areas that are within flood zone 3 and mitigate risk where necessary.

22. Ensure that any housing development is not impacted by poor air quality arising from any new major transport infrastructure located alongside or through the urban development.

23. To protect the historic setting of the route into Hereford and reduce air pollution along Kings Acre by protecting the historic avenue of Lime trees.

Policy RURA4: Rural strategic transport

A new railway station or parkway including bus and active travel infrastructure along the Hereford and Abergavenny rail line will be supported to enable a shift to a more sustainable transport network. **New developments in the market towns and rural settlements without rail access will be supported by regular, low cost, public bus services, particularly at peak times, to enable residents to access services, education and employment without the need to have access to a private car.**

In order to avoid any potential harmful effects to River Wye Special Area Conservation; other Special Areas of Conservation and Sites of Special Scientific Interest, developments must maintain an adequate buffer between operations and the River Wye Special Area of Conservation; other Special Areas of Conservation and Sites of Special Scientific Interest. In addition, site specific Habitats Regulation Assessments and targeted ecological surveys will be required for proposals to safeguard from physical damage and loss of habitat.